



**Environmental Health Department
Air Quality Program
Interoffice Memorandum**



Timothy M. Keller, Mayor

Danny Nevarez, Acting Director

To: Permit File

From: Regan Eyerman, Environmental Health Scientist

Date: March 16, 2018

Subject: Permit #3291-M1 and Certificate of Registration, **Airs #NM/001/04218, Facility ID: FA0007531; Record ID: PR0009050**

Location: Broadway HMA Plant, 5028 Broadway Blvd. SE, Albuquerque, NM 87105, UTMN: 3874900
UTME: 349665

Proposal: Albuquerque Asphalt, Inc. has submitted a construction air quality permit application, to modify Construction Permit #3291-1AR, to the Air Quality Program (Program) of the City of Albuquerque Environmental Health Department. Albuquerque Asphalt is requesting to permanently relocate to 5028 Broadway Blvd. SE and to operate the hot mix asphalt (HMA) plant on line power. The owner of this facility is Albuquerque Asphalt, Inc., 202 94th St. SW, Albuquerque, NM 87121.

The proposed facility will consist of one (1) hot mix drum, one (1) hot mix drum baghouse, five (5) cold feed bins, four (4) cold feed conveyors, one (1) cold feed scalping screen, one (1) cold feed pug mill, one (1) mineral filler silo with baghouse and auger, two (2) HMA RAP bins, three (3) HMA RAP conveyors, one (1) HMA RAP screen, one (1) HMA incline conveyor, six (6) HMA silos, two (2) HMA asphalt cement storage tanks, one (1) fuel oil fired hot oil heater, one (1) RAP/concrete crusher plant feeder, two (2) RAP/concrete crusher plant crushers, eight (8) RAP/concrete crusher plant conveyors, one (1) RAP/concrete crusher plant screen, one (1) RAP/concrete plant process engine, plant haul roads and aggregate/RAP/concrete storage piles.

A control efficiency of 91-95% on emissions will be achieved through a water injection system. Additionally a control efficiency of above 99% will be achieved using baghouses on the filler silo and the drum mixer. Material storage pile and haul road emissions are to be regulated under Fugitive Dust Control 20.11.20.12A. NMAC General Provisions.

Applicability: **Source Registration, 20.11.40.6 NMAC**
Any source which emits more than 2000 lbs of any air contaminant per year must obtain a Registration Certificate from the Program.

Construction Permit, 20.11.41 NMAC
20.11.41.2.C.(1) – Applicable as the applicant will be installing equipment which is subject to 20.11.63 NMAC.

Permit Fees, 20.11.2 NMAC

Permit application review fees:

20.11.2.19.A.(3) – Modification of existing permits for proposed sources with a proposed allowable emission rate equal to or greater than 50 tons per year and less than 75 tons per year: \$4,937.00.

The Department received proof of payment of \$4937 on December 4, 2017.

Note: CPI Adjusted fees are shown and went into effect January 1, 2017.

Annual emissions fee:

20.11.2.21.B – Sources shall pay a minimum annual emissions fee of \$207.00 flat or \$49.00 per ton, whichever is greater.

Note: CPI Adjusted fees are shown and went into effect January 1, 2018.

General Provisions, 20.11.1 NMAC

New Source Performance Standards (NSPS), 20.11.63 NMAC

20.11.63.11 – Federal Standard at 40 CFR Part 60, Subpart I for Hot Mix Asphalt Plants. The unit was constructed after June 11, 1973.

20.11.63.11 – Federal Standard at 40 CFR Part 60, Subpart OOO for Nonmetallic Mineral Processing Plants. The RAP/concrete plant was constructed, reconstructed, or modified after August 31, 1983, and capable of processing greater than 150 tons per hour of material.

Visible Air Contaminants, 20.11.5 NMAC

20.11.5.12 -- No person shall cause or allow visible emissions from any source to exceed 20 percent opacity, 6 minute timed average.

Ambient Air Quality Standards, 20.11.8 NMAC

Stationary sources must demonstrate compliance with the Federal and State ambient concentration standards specified in 20.11.8.13 NMAC.

Fugitive Dust Control, 20.11.20 NMAC

20.11.20.12.A – No person shall allow fugitive dust, track out, or transported material from vehicle traffic areas and haul roads to be carried beyond the property line, right-of-way, easement or any other area under control of the person generating or allowing the fugitive dust. To mitigate fugitive dust, all inactive disturbed surface areas must be stabilized and maintained in stable condition by the owner, operator, or person responsible for maintenance of the disturbed surface. Additionally, as cited in the permit application, some sections of the haul roads shall be paved and maintained as specified by 20.11.20.23.A and B NMAC.

Administration, Enforcement, Inspection, 20.11.90 NMAC

20.11.90.13.A- The owner or operator of any stationary source of an air contaminant shall, upon notification by the Director, maintain records of the nature and amounts of emissions, to which an air quality control emission regulation applies, from the source and any other information as may be deemed necessary by the Director to determine whether the source is in compliance with applicable regulations.

20.11.90.13.E-The Director shall establish a periodic visual surveillance system to detect and investigate apparent violations of visible emission limitations and such complaints relating to apparent violations of the regulations as may occur.

20.11.90.14.A-Upon request of the Director, the person responsible for the emission of air contaminants for which limits are established by the 20.11 NMAC rules shall provide such facilities,

utilities, and openings exclusive of instrument and sensing devices, as may be necessary for the proper determination of the nature, extent, quantity and degree of such air contaminants. Such facilities may be either temporary or permanent at the discretion of the person responsible for their provisions; and shall be suitable for determination consistent with emission limits established in these Parts.

Public Notice: Public notice for this permit was published on December 13, 2017 and ran through January 12, 2018. A request for the application was received by Ms. Marla Painter, President of Mountain View Community Action, on December 13, 2017. A request for a public information hearing was received by Ms. Nora Garcia, President of Mountain View Neighborhood Association, via email on January 11, 2018.

Compliance: The following permit conditions apply:

1. The equipment is considered a portable stationary source and may be relocated to another site provided the requirements are met in Condition I.5.h) prior to the relocation.
2. Fencing/barriers shall be installed and maintained restricting access to the property;
3. The hot mix asphalt (HMA) plant (Process Unit #15) shall not exceed 400 tons per hour (tph) production rate;
4. The recycled asphalt (RAP)/concrete plant (Process Unit #26) shall not exceed 200 tons tph production rate;
5. The HMA plant (except Process Units #18 and 20) shall operate seasonally, the total annual production is limited to 900,000 tons:
 - i. during the months of January through March, the total daily production is limited to 2800 tons;
 - ii. during the months of April through May, the total daily production is limited to 3600 tons;
 - iii. during the months of June through August, the total daily production is limited to 4000 tons;
 - iv. during the months of September through October, the total daily production is limited to 3600 tons; and,
 - v. during the months of November through December, the total daily production is limited to 2400 tons.
6. The heater (Process Unit # 20) may operate continuously;
7. The RAP/concrete Plant may operate seasonally, the total annual production is limited to 315,000 tons:
 - i. during the months of December through February, 8am to 5pm, 7 days per week;
 - ii. during the months of March through May, 7am to 5pm, 7 days per week;
 - iii. during the months of June through August, 7am to 7pm, 7 days per week;
 - iv. during the months of September through November, 7am to 5pm, 7 days per week.
8. As the above conditions show, the Facility is restricted to seasonal operating scenarios. These conditions have been placed in the permit based on air dispersion modeling of the Facility at this location to demonstrate compliance with the National Ambient Air Quality Standards and New Mexico Ambient Air Quality Standards for NO₂, CO, SO₂, PM_{2.5}, PM₁₀, and TSP;
9. In accordance with 40 CFR 63, Subpart ZZZZ §63.6590(c), an affected source that is a new or reconstructed stationary RICE located at an area source “must meet the requirements of this part by meeting the requirements of 40 CFR Part 60 Subpart IIII, for compression ignition engines.” The permittee shall comply with the specific requirements of Subpart IIII applicable to new stationary compression ignition internal combustion engines for Process Unit #38 (except as noted in the Condition below);
10. For Process Unit #38 for the Terex plant, in accordance with CFR 40 Subpart ZZZZ § 63.6603(a), the facility must comply with the requirements in Table 2d of the Subpart that apply;
11. Process Unit #15 is authorized to burn fuel/waste oil or natural gas/propane as the fuel;
12. Process Unit #20 is authorized to burn natural gas or low sulfur diesel;
13. For the Facility, working piles and working bins must remain at least 125 ft. from the property fence, while stationary equipment must remain at least 250 ft. from the fence;

14. The above condition shall be relaxed if the equipment is relocated to a smaller acreage property and air dispersion modeling is submitted that demonstrates compliance with the National Ambient Air Quality Standards and New Mexico Ambient Air Quality Standards
15. The southern access road is paved from Broadway into the facility. Please see Appendix A for which sections of the haul roads (PAG, PAS, PVO, PVI, COM) shall be paved;
16. Material storage piles shall be watered to control fugitive dust emissions from leaving the property;
17. Process Units #3, 6 and 10 shall each be operated with an atomized water spray bar. This condition has been placed in the permit based on air dispersion modeling of the Facility at this location to demonstrate compliance with the National Ambient Air Quality Standards and New Mexico Ambient Air Quality Standards for PM_{2.5}, PM₁₀, and TSP; and,
18. In the event of a malfunction causing the differential pressure for the Process Unit #15 baghouse to go near zero, the Facility shall be shut down and repairs shall be made to the affected equipment. Startup of the Facility shall not commence until the capture and control equipment is fully functional.
19. Vehicle traffic areas and haul roads shall be maintained and controlled pursuant to 20.11.20.12.A. NMAC, General Provisions, Fugitive Dust Control.
20. In accordance with 40CFR 60, Subpart I §60.92(a)(1), Emission Units #14 and 15 shall not discharge gases into the atmosphere, which contain particulate matter in excess of 90 mg/dscm (0.04 gr/dscf).
21. Pound per hour (lb/hr) Nitrogen Oxides (NO_x) and/or Carbon Monoxide (CO) emission rates for Emission Units #15, 20 and 38 shall be based on a 3-hour average.
22. In accordance with 40 CFR 60 Subpart IIII §60.4204(a), owners and operators of pre-2007 model year non-emergency stationary CI ICE with a displacement of less than 10 liters per cylinder must comply with the emission standards in Table 1 to this subpart. Owners and operators of pre-2007 model year non-emergency stationary CI ICE with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder must comply with the emission standards in 40 CFR 94.8(a)(1).
23. In accordance with 40 CFR 60 Subpart IIII §60.4204(b), owners and operators of 2007 model year and later non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder must comply with the emission standards for new CI engines in §60.4201, for their 2007 model year and later stationary CI ICE, as applicable.
24. In accordance with 40CFR 60, Subpart I §60.92 (a)(2), Emission Units #14 and 15 shall not exceed 20 percent opacity for any six (6) minute timed average.
25. Emission units #26 and 31 shall not cause or allow fugitive emissions that exceed 12 percent opacity as specified in 40 CFR Part 60, Subpart OOO, §60.672 (b).
26. Emission units # 27 through 30 and 32 through 37 and all affected transfer points shall not cause or allow fugitive emissions that exceed 7 percent opacity as specified in 40 CFR Part 60, Subpart OOO, §60.672 (b).
27. Except for the haul roads (Emission Unit #22), the remaining units shall not cause or allow fugitive emissions that exceed 20 percent opacity six (6) minute time-average. This condition is pursuant to 20.11.5.12 NMAC.
28. Maintain records of the daily and monthly production throughput (in tons) for the HMA plant and also for the RAP/concrete plant. Throughput records shall be maintained in order to calculate daily, monthly, seasonal, and annual throughputs.
29. Maintain data log of pressure differentials for the Emission Unit #15 baghouse to show that airflow is being maintained.
30. Maintain daily records of the number of hours of operation for the RAP/concrete plant. These records shall also include the start and stop times for each day of plant operation. Hours of operation records shall be maintained in order to calculate daily, monthly, seasonal, and annual hours of operation.
31. Maintain records of the application of water and/or chemical surfactant to haul roads and daily

- application of water to raw material storage piles. If application of water is not required, the daily record shall indicate why application was not necessary (i.e. recent rain, snowfall, etc.).
32. The permittee shall notify the Department in writing of:
 - i. Any change in control or ownership, name, address, or contact information. The permittee may request an administrative permit revision in accordance with 20.11.41.28.A NMAC;
 - ii. Any permit update or correction as required by 20.11.41 NMAC no more than 60 days after the permittee knows or should have known about the condition that requires updating or correction of the permit (20.11.41.21.A(6) NMAC);
 - iii. Replacement of emission units for which an allowable emissions limit has been established in the permit may be requested through a technical permit revision in accordance with 20.11.41.28.B NMAC;
 - iv. The anticipated date of the switch of fuel in the hot mix drum (Emission Unit #15) not less than thirty (30) days prior to that date; and,
 - v. An annual (January 1 through December 31 of the previous year) emissions inventory to include the annual hours of operation for the Facility together with descriptions of any reconfiguration of process technology and air pollution equipment by March 15 every year. The emissions inventory shall be calculated based on each individual pollutant's permitted pound per hour rate and reported for the actual hours of operation. Emission rates that are determined through compliance testing shall be used for all emission inventory reporting requirements (20.11.41.21.B NMAC).
 34. For the Emission Unit #15 baghouse, initial compliance tests shall be conducted in order to demonstrate compliance with the standard for particulate matter of any gas pursuant to 40 CFR 60, Subpart I §60.92(a)(1), and the standard for opacity pursuant to 40 CFR 60, Subpart I §60.92(a)(2). Initial compliance tests of the hot mix drum baghouse shall be conducted utilizing fuel/waste oil or natural gas/propane, depending on which fuel is available in the field, within the timeframes specified in Condition I.6.f).
 35. For the Emission Unit #15 baghouse, initial compliance tests shall also be conducted in order to demonstrate compliance of the lb/hr emission limits for NO_x and CO stated in Condition 2. Initial compliance tests of the hot mix drum baghouse shall be conducted utilizing fuel/waste oil or natural gas/propane, depending on which fuel is available in the field, within the timeframes specified in Condition I.6.f).
 36. Unless previously completed, in accordance with 40CFR 60, Subpart OOO §60.672(b), 20.11.41.22 NMAC and 20.11.90.13 F. NMAC, Performance Testing Following Startup and Performance Tests respectively, an initial performance test shall be conducted on Emission Units #26 through 37, along with affected transfer points, to demonstrate compliance with the opacity standards established in Condition I.2.a). The compliance tests shall be conducted in accordance with EPA Method 9 found in Appendix A of 40 CFR 60, and the procedures found in Subpart A of 40 CFR 60.11. These tests shall be conducted within 60 days after achieving the maximum production rate at which affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Department.
 37. Annual compliance tests have been imposed on Emission Unit #15 baghouse to demonstrate compliance with the standard for particulate matter of any gas pursuant to 40CFR 60, Subpart I §60.92(a)(1), and the standard for opacity pursuant to 40 CFR 60, Subpart I §60.92(a)(2). Annual compliance tests of the hot mix drum baghouse shall be conducted utilizing fuel/waste oil or natural gas/propane as the fuel. Compliance tests shall be conducted in accordance with EPA methods contained in Appendix A of 40CFR, Part 60, unless otherwise approved by the Department.

38. For Emission Unit #38, initial compliance tests shall be conducted in order to demonstrate compliance of the NO_x, CO and opacity emissions stated in Condition I.2.a) or Condition I.2.g) which shall be conducted within the timeframes specified in Condition I.6.e). Compliance tests and a testing schedule may be re-imposed (or imposed) if inspections of the source indicate non-compliance with permit conditions or the previous test showed non-compliance or was technically unsatisfactory. The compliance test shall be conducted in accordance with EPA methods contained in Appendix A of the CFR, Title 40, Part 60, unless otherwise approved by the Department.

Actions Taken:

- 12/4/2017 Received application
- 12/6/2017 Application ruled administratively complete
- 12/8/2017 Received updated application
- 12/13/2017 Request for the application received by Marla Painter, President of Mountain View Community Action
- 1/11/2018 Request for PIH received by Nora Garcia, President of Mountain View Neighborhood Association
- 1/29/2018 Permit extension request approved by Department Director
- 2/21/2018 Air dispersion model review completed

Annual Fees: Pursuant to Permit Fees, 20.11.2.21.B NMAC, annual fee of \$10,241.00 (209 tpy @ \$49.00 per ton)

Emission Unit Number	NO_x tpy	CO tpy	VOC tpy	SO₂ tpy	TSP tpy	HAPs tpy
1	--	--	--	--	2.0	--
2	--	--	--	--	1.2	--
3	--	--	--	--	0.04	--
4	--	--	--	--	0.57	--
5	--	--	--	--	0.04	--
6	--	--	--	--	0.04	--
7	--	--	--	--	0.04	--
8	--	--	--	--	0.04	--
9	--	--	--	--	0.22	--
10	--	--	--	--	0.02	--
11	--	--	--	--	0.37	--
12	--	--	--	--	0.02	--
13	--	--	--	--	0.02	--
14	--	--	--	--	0.05	--
15	25	59	14	26	15	4.72
16	--	0.53	5.5	--	0.26	--
17	--	0.61	1.9	--	0.23	--
20	1.71	0.90	0.12	0.61	0.17	--
21	--	--	0.16	--	--	--

22	--	--	--	--	6.6	--
23	--	0.16	0.50	--	--	--
24	--	--	--	--	1.8	--
25	--	--	--	--	1.8	--
26	--	--	--	--	0.45	--
27	--	--	--	--	0.05	--
28	--	--	--	--	0.05	--
29	--	--	--	--	0.03	--
30	--	--	--	--	1.3	--
31	--	--	--	--	0.27	--
32	--	--	--	--	0.03	--
33	--	--	--	--	0.03	--
34	--	--	--	--	0.05	--
35	--	--	--	--	0.05	--
36	--	--	--	--	0.05	--
37	--	--	--	--	1.1	--
38	26.0	4.1	0.51	0.52	1.6	--
Total = 209 tons	53	65	23	27	36	5

Process Equipment Table

Process Units #	Process Units Description	Manufacturer	Model Number	Serial Number	Manufacture Date	Installation Date	Rated Process Rate	Unit Subject To NSPS
1	HMA Cold Aggregate/RAP Storage Piles	N/A	N/A	N/A	N/A	N/A	370 tph	No
2	HMA Cold Aggregate Feed Bins (5)	Astec	1014-5	17-098-319740-1-1	2017	2017	230 tph	No
3	HMA Cold Aggregate Feed Bin Conveyor	Astec	PSS-412-60	17-098-319740-2-1	2017	2017	230 tph	No
4	HMA Scalping Screen	Telsmith	4x12 SDVK	S0199	2017	2017	230 tph	No
5	HMA Scalping Screen Conveyor	Astec	PSS-412-60	17-098-319740-2-1	2017	2017	230 tph	No
6	HMA Pug Mill	Astec	PLM-T400-60	17-098-319740-3-1	2017	2017	236 tph	No
7	HMA Scale Conveyor	Astec	PSS-462-60	17-098-319740-2-1	2017	2017	236 tph	No
8	HMA Slinger Conveyor	Astec	PLM-T400-60	17-098-319740-3-1	2017	2017	236 tph	No
9	HMA RAP Bins (2)	Astec	RB-1014-2	17-098-319740-18-1	2017	2017	140 tph	No

Process Units #	Process Units Description	Manufacturer	Model Number	Serial Number	Manufacture Date	Installation Date	Rated Process Rate	Unit Subject To NSPS
10	HMA RAP Bin Conveyor	Astec	RB-1014-2	17-098-319740-18-1	2017	2017	140 tph	No
11	HMA RAP Screen	Telsmith	4x8 SDVK	S0200	2017	2017	140 tph	No
12	HMA RAP Transfer Conveyor	Astec	SS-48-50	17-098-319740-19-1	2017	2017	140 tph	No
13	HMA RAP Transfer Conveyor	Astec	RIC-3025	17-098-319740-36-1	2017	2017	140 tph	No
14	HMA Mineral Filler Silo	Astec	DA650C	11-037	2017	2017	6 tph	Yes
15	HMA Drum Dryer/Mixer	Astec	PDM-9638	17-098-319740-5-1	2017	2017	400 tph	Yes
16	HMA Incline Conveyor	Astec	SEB-10036	17-098-319740-24-1	2017	2017	400 tph	No
17	HMA Silos (6)	Astec	KGW-200	C17-081 C17-082	2017	2017	400 tph	No
20	HMA Heater	CEI	CHT-350P	C17-083	2017	2017	2.5 MMBtu/hr	No
21	HMA Cement Storage Tanks (2)	CEI	CTA-30DP	C17-085	2017	2017	5206 gal/hr	No
22	Haul Roads	N/A	N/A	N/A	N/A	N/A	N/A	No
23	HMA Yard	N/A	N/A	N/A	N/A	N/A	400 tph	No
24	Raw RAP/Concrete Storage Pile	N/A	N/A	N/A	N/A	N/A	300 tph	No
25	RAP/Concrete Crusher Plant Feeder	Terex Lippmann KPI Kleemann	Terex 4242SR Lippmann TBD* KPI FT4250CC Kleemann MR 110Z/110	Terex 420140CCSR Lippmann TBD* KPI TBD* Kleemann TBD*	Terex 2005 Lippmann TBD* KPI 2017 Kleemann TBD*	Terex 2017 Lippmann TBD* KPI TBD* Kleemann TBD*	300 tph	No
26	RAP/Concrete Crusher Plant Primary Crusher						300 tph	Yes
27	RAP/Concrete Crusher Plant Crusher Conveyor						300 tph	Yes
28	RAP/Concrete Crusher Plant Screen Conveyor						300 tph	Yes
29	RAP/Concrete Crusher Plant Transfer Chute						300 tph each	Yes
30	RAP/Concrete Crusher Plant Screen						480 tph	Yes
31	RAP/Concrete Crusher Plant Secondary Crusher						180 tph	Yes
32 and 33	RAP/Concrete Crusher Plant Transfer Conveyor						180 tph each	Yes
34, 35 and 36	RAP/Concrete Crusher Plant Transfer Conveyor						300 tph each	Yes

Process Units #	Process Units Description	Manufacturer	Model Number	Serial Number	Manufacture Date	Installation Date	Rated Process Rate	Unit Subject To NSPS
37	RAP/Concrete Crusher Plant Stacker Conveyor						300 tph	Yes
38	RAP/Concrete Crusher Plant Main Generator	Caterpillar**	TBD*	TBD*	Between 2004 and 2017	TBD*	≤ 817 hp	Yes***

* TBD – to be determined

** Except for Kleermann plant whereby the manufacturer is Scania

*** Except for Terex plant

Air Pollution Control Equipment*

Type of Control Equipment	Process Unit Number Controlled	Manufacturer	Model Number	Serial Number	Rated Process Rate	Control Efficiency
Baghouse	14	Astec	N/A	N/A	Unknown	99%**
Baghouse	15	Astec	PEBH-70-24	17-098-319740	69,685 ACFM	99.88%

* Each baghouse stack must meet NSPS (40 CFR §60.92) limits for opacity and particulates

** Engineering judgement based on lower end of baghouse controls